



Rainbow PUSH Coalition  
930 E. 50<sup>th</sup> Street  
Chicago, IL 60615

January 7, 2011

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Ex Parte Notice in WC Dockets 11-42, 03-109 and CC Docket 96-45**

Dear Ms. Dortch:

On Thursday, January 5, 2012, Dr. George Korn, associate professor, Ohio University School of Media Arts and Studies and advisor to Rev. Jesse Jackson; Bishop Simon Gordon, midwest regional bishop, Full Gospel Baptist Church Fellowship; Bishop Dr. James Dukes, bishop of social justice, United Pentecostal Churches of Christ International; Bishop Tavis Grant, national field director, Rainbow PUSH Coalition; and Rev. Steven Smith, director, Rainbow PUSH Coalition Telecommunications Project, met with FCC Commissioner Robert McDowell and Christine Kurth, policy director and wireline counsel for Commissioner McDowell and separately with FCC Commissioner Mignon Clyburn and Angela Kronenberg, wireline legal advisor for Commissioner Clyburn, regarding the above-referenced Lifeline and Link-Up proceedings.

Dr. Korn introduced the clergy and explained that each serves a congregation as pastor as well as serving in the broader role indicated by their titles. Korn also presented the commissioner with a letter (attached) previously submitted into the Lifeline dockets signed by 59 clergy from around the country expressing their support for the Lifeline program and the need to avoid creating barriers to enrollment for low income individuals. The signees consist of both pastors of individual congregations and denominational leaders together representing hundreds of thousands of church members. He explained that the purpose of the meeting was to give the commissioner a sense of everyday life in low income communities and provide examples of how, without a telephone, poor people become disconnected from society. Without phone service,

the most basic processes and activities become difficult, limiting options and possibilities for the poor and pushing them to the fringe of society.

Before the presentation by the clergy, Dr. Korn reviewed the Rainbow PUSH Coalition's position on several of the potential Lifeline reforms and indicated RPC's support for a transition to broadband, but only while maintaining easy access to basic wireless phone service for the neediest Americans throughout the transition. Using the current low Lifeline participation rate as an example, it is clear that finding an economical way to reach the low income community with wireless broadband will be a project that will span a number of years. We cannot deprive low income citizens of basic wireless phone service in the meantime.

As detailed in the attached document, the RPC position was expressed in four key points:

1. With a program participation rate at approximately 32% of eligible households, we oppose capping the program. A cap is incompatible with the mission Congress intended for the program.
2. We oppose requiring Lifeline applicants to supply documentation of eligibility, such as "food stamp letters". It has been demonstrated that such a requirement places a hardship on many and limits enrollment. As a solution to documentation issues, we support the development of the national, industry-wide, "de-duplication and verification database" as proposed by Nexus and Tracfone. While an interim verification process may be required while the database is being developed, we feel implementation of the database is the most effective solution to issues of fraud. We oppose solutions that put an added burden on the poor, the vast majority of whom are following the rules.
- 3) We oppose the implementation of a minimum monthly fee for Lifeline service. This again places unnecessary economic hardship on our neediest citizens who participate in the program.
- 4) Finally, while we recognize modifications to Link-Up may be necessary, we oppose complete elimination of Link-Up and encourage the FCC to recognize that Link-Up is an important subsidy for those carriers who are most active in reaching the low-income community. Without it, many may be forced out of business leaving large parts of the low income community un-served. Also, as we move toward universal broadband, Link-Up may well be a necessary component in reaching the low income community with broadband service. We advocate a re-envisioning of Link-Up rather than its elimination.

Dr. Korn asked Commissioner McDowell to consider what life would be like without access to a phone. He pointed out that Nexus Communications reports that over 62% of its Lifeline applicants have not had phone service for a year or more when they apply and 75% have no access to the Internet. He pointed out that the latest statistics show

that 40% of Americans have no discretionary income. A telephone is something that poor people do without and it's a tool that they need to maintain and improve their lives.

Bishops Gordon, Dukes and Grant proceeded to present accounts of the reality of everyday life in low income communities and the need poor people have for telephone service. The examples included the need for telephone communication for mentoring young people, obtaining food bank services, job placement and work scheduling, teacher/parent school issues, medical needs, emergencies, child care needs, utility shut-offs, preventing criminal recidivism, and more. It was pointed out that because of unstable housing conditions, a cell phone number often becomes the equivalent of an address. There are a number of programs and services that can only be accessed if an individual has a telephone number. A phone number is a step toward stability.

The bishops also pointed out that churches in low income communities have become answering services. Because they don't have phone service, many people give their church's number out when they need to provide a contact number. A significant amount of time is spent by church personnel answering calls for members that come in on church numbers. This is an awkward and time-consuming process. But if the church doesn't do it, many of these folks would be out of touch and isolated.

The bishops made it clear that Lifeline is an important program that meets a real need in the low income community and they urged the commissioner to maintain it and not add barriers to access.

As the attached clergy letter states: We believe in this program and have a deep and passionate desire to see it continue in its present form so it can continue to serve the most vulnerable. When poor people have their electricity cut off, heat cut off, can't pay their rent and afford their medicine, this service allows them some means of staying connected to family, friends, and yes, even their church and pastor, in hopes of finding some help in times of trouble. Lifeline and Link-Up provide a light in the midst of darkness so that the poor can have a fighting chance to see their way out.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically. If you have questions regarding this letter, please contact me directly.

Sincerely,

/s/ George Korn

George Korn, Ph.D.  
Advisor to Rev. Jesse L. Jackson, Sr.

Cc:

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